

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
DIVISION OF AIR AND HAZARDOUS MATERIALS

Hazardous Waste Treatment and Storage Facility Inspection Checklist

PRE-INSPECTION

Company Name Ciba-Geigy

Location Mill St.

Cranston

EPA ID No. RI0001194323

Contact Dr. Crowley <sup>esp. cognizant of RCRA regs.</sup>  
Ron Buttery <sup>shift</sup>  
Title One of four sup's respon-  
sible for all environmental  
Telephone No. reg. observance

Permit granted? Yes      No ✓

Today's Date 2/11/85

Also: Arthur Hancio, Purchasing Mgr.

Proper manifest copies being submitted?	Yes <u>✓</u>	No <u>    </u> (6.10)
Any re-occurring mistakes on manifests?	Yes <u>    </u>	No <u>    </u> (6.10)
Only authorized agents signing manifests?	Yes <u>    </u>	No <u>    </u> (6.15)
• Any manifest discrepancy reports received?	Yes <u>    </u>	No <u>    </u> (6.11) (264.72)
Any notices of foreign shipment?	Yes <u>    </u>	No <u>    </u> (6.01a)
• Annual/biennial reports received?	Yes <u>✓</u>	No <u>    </u> (6.14) (264.75)
Any notifications of contingency plan implementation?	Yes <u>    </u>	No <u>✓</u> (6.09) 40 CFR 2
Has company been inspected before?	Yes <u>✓</u>	No <u>    </u>
✓ If yes, date? <u>7/13/84</u>		
<u>W/ Julie Miller</u>		
Is this inspection the result of a complaint?	Yes <u>    </u>	No <u>✓</u> if yes,
Complaint No. <u>    </u>	Nature of complaint <u>    </u>	

Waste type(s) facility is permitted to treat and/or store, and how

✓ chlorinated solvent use has been reduced



SEMS DocID 667460

✓ 85/12/5 Prod'n stop  
20 Kettle boilouts

Ralph Perrotta, Plant Supt.  
Gaganeau Senior Effluent Techni-  
cian

# Wastes in drums

No. of drums

✓ 1:

Accum. <sup>start</sup>: 10/30/84

15

HC, excipients, D001: 9+7

Flam'ol solid, F003/U239: 1

1

Ammonium thiosulfate, RI 1B/7C: 2

2

Arom. anhydride, D002, U002: 1

1

" cyclic imide, RI 1C: 1

1

Organic solvents, process sample, RI 1B/3C: 1

1

Triazole, solv., std, F003: 2

2

U169, substituted azo<sub>cpd</sub>: 2

2

U169, U012, substituted triazole: 3+5

8

Filter media, F005: 1

1

Still sludge, F003: 4+4+2+2+2

14

Solvent-wet absorbent, D001: 2+2+2

5

Halogenated org. solids, 7C Type 9: 2+2

4

Aromatic amines

20 + 28

48

115

Enforcement actions? 1        No ☒ If yes, site(s) and type(s)       

Outstanding violations       

Special permit conditions? Yes        No        If yes, outline       

n/a

Groundwater monitoring waiver granted? Yes        No       , or is request pending? Yes        No        n/a

Have the following plans been submitted, reviewed, and approved?

Waste Analysis Yes ☒ No        (5.04i)

(264.13)

n/a Groundwater Monitoring Yes        No        (5.04g)

(264.91-94)

Paula Inspection Schedule Yes        No        (5.04k)

(264.15)

Preparedness and Prevention Yes ☒ No        (5.04l)

(264.30-264.37)

Paula Contingency Yes        No        (5.04m)

(264 Subpart D)

Training Yes ☒ No        (5.04q)

(264.16)

Closure Yes ☒ No        (5.04r)

(264 Subpart G)

Financial Yes ☒ No        (5.04t)

(264 Subpart H)

Have local emergency authorities been contacted? Yes ☒ No        (6.08) (264 C)

#### ON-SITE CONFERENCE AND RECORD REVIEW

Was company called before inspection? Yes ☒ No       

Date 2/7/85 Inspector(s)       

Present for company Crowley, Buttery, Hanaia

X Does facility have notices to generators on file? Yes        No        (6.01b)

Is the waste analysis p available?

Yes ☒

No (6.02)

Are all results on file?

Yes ☒

No (6.02)

Is the plan being followed?

Yes

No (6.02)

X Is the groundwater monitoring plan available? *n/a*

Yes

No (6.03), or waived?

Are all results on file?

Yes

No (6.03)

Is the plan being followed?

Yes

No (6.03)

Paula Is the inspection schedule available?

Yes ☒

No (6.05)

Is the log up to date?

Yes ☒

No (6.05)

Is the schedule being followed?

Yes ☒

No (6.05)

Is the personnel training plan available?

Yes ☒

No (6.06)

Job titles/descriptions/  
employees

Yes ☒

No (6.06)

Training records

Yes ☒

No (6.06)

Date of last training/review?

Yes ☒

No (6.06)

*10 & 11/05 mostly*  
Do personnel seem aware of  
procedures?

Yes

No (6.06)

Is the contingency plan available?

Yes ☒

No (6.09)

Any incidents?

Yes

No ☒ If yes, explain

Are manifests being properly main-  
tained? *Last: 1/31/95 Copy*

Yes ☒

No (6.10) If no,

Type of problem

Is the operating record available?

Yes ☒

No (6.12)

Description and quantity  
of waste, etc.?

Yes ☒

No (6.12)

Closure plan on-site?

Yes ☒

No (6.12)

Current closure cost  
estimate?

Yes ☒

No (6.12)

5.09(i)  
264.13

5.09(g)  
264.91-99

264.15

264.16

264.51-54  
Subpart D

264.73

Financial assurance mech in-place?

Yes ☐

No ☐ (6.17)

and up-to-date?

Yes ☐

No ☐ (6.17)

Insurance policy up-to-date?

Yes ☒

No ☐ (6.17)

*not year to year*

Is emergency equipment (sprinklers, extinguishers) being inspected, maintained?

Yes ☒

No ☐ (6.08)

Were all records available?

Yes ☒

No ☐ (6.13)

264 Subpart H

264.147

## OPERATING STANDARDS

Security - 24-hour surveillance?

Yes ☒

No ☐ (6.04), or

Artificial or natural barrier?

Yes ☐

No ☐ (6.04), and

*both*

Means to control entry?

Yes ☒

No ☐ (6.04), and

Warning signs posted?

Yes ☒

No ☐ (6.04)

Ignitable, reactive, or incompatible wastes?

Yes ☐

No ☐ If yes,

*hot-work tickets  
(rec'd sample)*  
Protected from ignition or reaction sources?

Yes ☐

No ☐ (6.07)

"No Smoking" signs posted?

Yes ☐

No ☐ (6.07)

Compliance with NFPA regulations? Yes ☐ No ☐ (Refer to recent fire authority inspections; you may have to request one)

Preparedness and Prevention (6.08)

264 Subpart C

Is facility operated in a way to minimize chances of fire, explosion, or release?

Yes ☐

No ☐

If needed, does facility have:

Internal communications?

Yes ☐

No ☐ NA ☐

Telephone?

Yes ☐

No ☐ NA ☐

Fire, spill control, and/or decontamination equipment?

Yes ☐

No ☐ NA ☐

Hydrants, sprinklers, and/or foam?

Yes ☐

No ☐ NA ☐

Do personnel have access to alarms, if needed?

Yes ☐

No ☐ NA ☐

264.14

264.17

Does single employee have access to telephone,  
if applicable?

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Is adequate aisle space being  
maintained?

Yes \_\_\_\_\_ No \_\_\_\_\_

Container Condition and Labelling (6.18)

269 Subpart I

Containers in good condition?

Yes ☒ No \_\_\_\_\_

Container compatible with waste?

Yes ☒ No \_\_\_\_\_

Containers closed?

Yes ☒ No \_\_\_\_\_

Containers handled to  
cause leak?

Yes \_\_\_\_\_ No ☒

Containment area-base free of cracks?

Yes \_\_\_\_\_ No \_\_\_\_\_

Containers protected from con-  
tact with standing liquid?

Yes \_\_\_\_\_ No \_\_\_\_\_

Containment volume equal to 10% of  
stored, or volume of largest con-  
tainer?

Yes \_\_\_\_\_ No \_\_\_\_\_

Run-on prevented?

Yes \_\_\_\_\_ No \_\_\_\_\_

Liquids removed promptly?

Yes \_\_\_\_\_ No \_\_\_\_\_

Containers with I or R waste 50 feet  
from property line?

Yes \_\_\_\_\_ No \_\_\_\_\_

Any IWM in storage?

Yes \_\_\_\_\_ No \_\_\_\_\_ if yes, complete

IWM in same container?

Yes \_\_\_\_\_ No \_\_\_\_\_

Hazardous waste in unwashed con-  
tainer which contained IWM?

Yes \_\_\_\_\_ No \_\_\_\_\_

Hazardous waste stored near IWM?

Yes \_\_\_\_\_ No \_\_\_\_\_

Do labels contain the following information?

Generator's name and address

Yes \_\_\_\_\_ No \_\_\_\_\_

Waste type

Yes \_\_\_\_\_ No \_\_\_\_\_

Manifest number

Yes \_\_\_\_\_ No \_\_\_\_\_

D.O.T. shipping name

Yes \_\_\_\_\_ No \_\_\_\_\_

Date of containerization

Yes \_\_\_\_\_ No \_\_\_\_\_

Words "Hazardous Waste"

Yes \_\_\_\_\_ No \_\_\_\_\_

Tank Storage (6.21)

Subpart J

Waste incompatible with tank stored  
in lined tank?

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Is overfilling prevented?

Yes \_\_\_\_\_ No \_\_\_\_\_

Does uncovered tank have sufficient  
fireboard?

Yes \_\_\_\_\_ No \_\_\_\_\_

Hazardous waste removed at closure?

Yes \_\_\_\_\_ No \_\_\_\_\_

Is I or R wastes in tank either:

Treated immediately to be not  
I or R

Yes \_\_\_\_\_ No \_\_\_\_\_

Protected from ignition or  
reaction

Yes \_\_\_\_\_ No \_\_\_\_\_

Used for emergencies only

Yes \_\_\_\_\_ No \_\_\_\_\_

Does I or R waste tank comply with NFPA buffer zone requirements in Tables 2-1  
through 2-6 of Flammable and Combustible Code--1977?

Yes \_\_\_\_\_ No \_\_\_\_\_

Does IWM in same tank create hazard?

Yes \_\_\_\_\_ No \_\_\_\_\_

Is hazardous waste placed in tank  
that contained IWM?

Yes \_\_\_\_\_ No \_\_\_\_\_

Notes ---

Follow-up action - Letter of Compliance

Letter of Deficiency

Notice of Violation and Order

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Tank Storage (6.21)

Subpart J

Last page of original checklist  
Original is copied and discarded.

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in lined tank?

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Is overfilling prevented?

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Letter of Deficiency \_\_\_\_\_

Notice of Violation and Order \_\_\_\_\_